

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

DR. AMY R. WOODS PLAINTIFF

VS CIVIL ACTION NO. 3:19-CV-00234-NBB-RP

MHM HEALTH PROFESSIONALS, LLC, D/B/A
CENTURION PROFESSIONALS;
MANAGEMENT & TRAINING CORPORATION
JESSE WILLIAMS, INDIVIDUALLY;
AND JOHN DOES 1-9 DEFENDANTS

ZOOM DEPOSITION OF TRAVIS DAY

Taken at the Instance of the Plaintiff
with All Parties Appearing by Zoom Videoconferencing

On August 30, 2020

At 8:15 a.m.

REPORTED BY: SHARRON F. ALLEN, CSR, RPR
CSR NO. 1144

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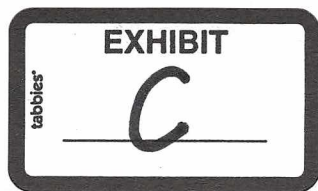
REPRESENTING TRAVIS DAY

ALSO PRESENT: DR. AMY WOODS

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SHARRON ALLEN & ASSOCIATES
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1 TRAVIS DAY,
2 having first been duly sworn, was examined and
3 testified as follows:
4 EXAMINATION
5 BY MR. WAIDE:
6 Q. Mr. Day, can you hear me?
7 A. Yes, sir.
8 Q. Mr. Day, can you hear me?
9 A. Yes, sir, I can.
10 Q. Okay. We've been having some sound
11 problems, but we'll just start and go slow, and
12 I'll try to let you know if I'm not hearing what
13 you're saying.
14 A. Okay.
15 MR. WAIDE: Sharron, do you want to
16 call the roll and make sure everybody's
17 here?
18 COURT REPORTER: Yes. We have
19 Mr. Long-Daniels; Mr. Peeples; Mr. & Mrs.
20 Waide; Dr. Woods; the witness, Mr. Day;
21 Elizabeth Hadley; Jacob Dean; and Louis
22 Watson.
23 MR. LONG-DANIELS: Who is Louis
24 Watson?
25 MR. WATSON: I'm Mr. Day's attorney.

1 MR. LONG-DANIELS: Oh. Well,
2 welcome. Are you in Mississippi too?
3 MR. WATSON: Yes, I am.
4 MR. LONG-DANIELS: Well, good. I
5 like to see people in Mississippi.
6 They're good people.
7 MR. WAIDE: Well, it depends on who
8 you ask.
9 MS. WAIDE: I like to think so.
10 BY MR. WAIDE:
11 Q. Mr. Day, are you ready to begin your
12 deposition?
13 A. I am.
14 Q. Would you state your name, please, sir.
15 A. Travis Day.
16 Q. What is your mailing address, Mr. Day?
17 A. 4507 Lyons Run Circle, Apartment T2,
18 Owings Mills, Maryland.
19 MS. WAIDE: Y'all, we can only hear
20 about every second word that Mr. Day says.
21 I don't know what is happening with our
22 audio. Is anyone else having that same
23 trouble?
24 MR. LONG-DANIELS: No. I hear every
25 word.

1 Q. All right, sir. Am I correct in saying
2 that you were hired in Marshall County,
3 Mississippi, to work for Centurion around May of
4 2019?
5 A. Yes, sir.
6 Q. And what was your job?
7 A. I was the health services
8 administrator.
9 Q. What did that consist of? What were
10 your duties?
11 A. I ran the day-to-day activities as a
12 liaison between the company and the client,
13 which is MTC, scheduling nurses or the nursing
14 staff, things like that.
15 Q. All right. You were the liaison with
16 MTC. Is MTC the company that operated the
17 prison in Marshall County?
18 A. Correct.
19 Q. When you were hired, were you given any
20 instructions about the importance of maintaining
21 a good relationship with MTC? Did you feel that
22 was part of your job duties?
23 A. You said was I given something?
24 Q. Yes, sir. Did the company instruct --
25 did any superiors instruct you when you were

1 MS. HADLEY: I hear just fine.
2 MS. WAIDE: I'm going to do the only
3 thing I know to do technically, which is
4 start over. So let me leave y'all for one
5 minute and then come right back.
6 MR. LONG-DANIELS: Okay.
7 (OFF THE RECORD)
8 BY MR. WAIDE:
9 Q. Mr. Day, the court reporter may have
10 already gotten this, but we didn't hear it.
11 Would you give us your mailing address again,
12 please, sir.
13 A. 4507 Lyons Run Circle, Apartment T2,
14 Owings Mills, Maryland.
15 Q. Where are you employed today, Mr. Day?
16 A. At Frontier Medical.
17 Q. What is that?
18 A. It's a correctional company,
19 correctional healthcare company.
20 Q. Do you do the same type of work there
21 that you did --
22 A. I do.
23 Q. -- when you worked in Marshall County,
24 Mississippi?
25 A. I do.

1 hired to maintain a good relationship with MTC?
2 A. Yes, sir.
3 Q. They did?
4 A. Yes, sir.
5 Q. And did you try to do that? Did you
6 try to maintain a good relationship with MTC?
7 A. I like to think I did.
8 Q. All right. And how did you go about
9 doing that, having a good relationship with
10 them?
11 A. Just by developing relationships,
12 getting to understand how they, you know, did
13 things there, what their expectations of us were
14 as a medical group.
15 Q. Did you feel like, in doing your job,
16 that you should refrain from being harsh with
17 them or criticizing them? Did you feel like
18 that's the way you should carry out your job
19 duties?
20 MR. LONG-DANIELS: Object to the
21 form.
22 A. No, sir.
23 BY MR. WAIDE:
24 Q. I'm sorry?
25 MR. LONG-DANIELS: Same objection.

1 You can answer, Mr. Day.
 2 A. I would say no, I didn't feel like I
 3 needed to refrain from being harsh with them.
 4 BY MR. WAIDE:
 5 Q. All right. What about Dr. Woods? What
 6 was your relationship with her?
 7 A. It was strictly a working relationship.
 8 She was the medical director; I was the health
 9 services administrator, and our goal would be to
 10 work together to see how we could be most
 11 efficient in the prison.
 12 Q. Did you ever hear her making any
 13 statements concerning failure of MTC to get
 14 prisoners over for medical treatment in a timely
 15 fashion?
 16 A. I wouldn't necessarily call it a
 17 failure, but she complained about different
 18 staffing things.
 19 Q. All right. Are you talking about
 20 staffing things by whom? By MTC?
 21 A. MTC.
 22 Q. If you would -- you only worked with
 23 her for a short time, less than two months, if
 24 I'm not mistaken. Right?
 25 A. That's correct.

1 times per week.
 2 BY MR. WAIDE:
 3 Q. My question was could it have been as
 4 many as two or three times a week that she would
 5 make complaints like that?
 6 MR. LONG-DANIELS: Objection to form.
 7 A. Yeah, I don't want to . . . Yeah.
 8 BY MR. WAIDE:
 9 Q. Okay. What, if anything, did you do in
 10 regard to her statements about that?
 11 A. Well, of course you always want to find
 12 out, you know, what's going on, if there's
 13 anything else going on in the prison that's
 14 keeping or prohibiting, you know, custody from
 15 bringing inmates down to medical.
 16 Q. Did you have -- well, first of all, she
 17 was the -- was she one of two medical doctors
 18 that were on staff while you were there, or was
 19 she the only medical doctor that was on staff?
 20 A. When I initially got there, she was the
 21 only medical doctor.
 22 Q. So far as determining, then, whether a
 23 prisoner had a serious medical need, would she
 24 be the only person that was on the grounds there
 25 at -- or strike that.

1 Q. During the less than two months that
 2 you worked with her, just tell us, as best you
 3 can, what you can remember her saying concerning
 4 getting prisoners over to see her for medical
 5 treatment. What can you remember her saying
 6 about it?
 7 A. Well, she had issues, say, with the
 8 time frame in which inmates were, you know,
 9 being brought down. I guess it was taking too
 10 long to get inmates or get patients.
 11 Q. How often would you -- now, you were
 12 only there -- well, say on a weekly basis, how
 13 often would you hear her make statements like
 14 that?
 15 A. I can't put a gauge on it.
 16 Q. Could it have been as much as two or
 17 three times a week you would hear her make
 18 statements like that?
 19 MR. LONG-DANIELS: Objection. Object
 20 to the form.
 21 BY MR. WAIDE:
 22 Q. Do you understand my question?
 23 MR. LONG-DANIELS: You can answer,
 24 Mr. Day, subject to my objection.
 25 A. I'm saying I can't gauge a number of

1 would she be the most qualified person
 2 that was on the grounds there at Marshall County
 3 to determine whether a prisoner had a serious
 4 medical need?
 5 MR. LONG-DANIELS: Objection to form.
 6 A. Well, she was the medical director, so
 7 she would be, yes, the senior person on ground
 8 to make that decision.
 9 BY MR. WAIDE:
 10 Q. All right. So in order to determine
 11 whether a prisoner had a serious medical need,
 12 it would be necessary for the prisoners to be
 13 brought over to her clinic or her facility there
 14 on the Marshall County Correctional Facility
 15 grounds, would it not?
 16 MR. LONG-DANIELS: Objection to form.
 17 A. Just -- well, short of an emergency,
 18 yes.
 19 BY MR. WAIDE:
 20 Q. Okay. How much experience have you had
 21 dealing with prisoners? How many years'
 22 experience have you had dealing with prisoners?
 23 A. About 11 years.
 24 Q. Do you agree that sometimes they'll
 25 fabricate their claims about their injury? Does

1 that happen from time to time?

2 A. Yes, sir.

3 Q. So would you agree that, in order to

4 determine whether a prisoner really has a

5 serious medical need, it would be necessary for

6 the prisoner to be assessed by a trained medical

7 person? Would you agree with that?

8 A. Yes, sir.

9 Q. Okay. You earlier indicated, if I

10 understand it right, that you thought, from the

11 instructions you received and from what you

12 thought, that you should maintain a good

13 relationship with the people at MTC. Am I

14 correct?

15 A. Yes, sir.

16 Q. In the short time you were there, did

17 you have regular meetings with the warden,

18 warden Williams?

19 A. I went to regular warden's meetings.

20 Q. Okay. Were you the only representative

21 of Centurion that went to those meetings, or

22 would anybody else have come with you from

23 Centurion?

24 A. Just me.

25 Q. So you would be the sole representative

1 whom did you address them with?

2 A. Custody staff.

3 Q. You mean the MTC people?

4 A. Yes, sir.

5 Q. Okay. So you did take her concerns and

6 address them with the MTC staff?

7 A. Yes, sir.

8 Q. Do you remember specifically who you

9 talked to about her concerns with the MTC staff?

10 A. So anytime I had an issue whereby, you

11 know, we believed that it was taking a while for

12 us to get a patient, I would always start with

13 the dorm sergeant, whomever that would be, and

14 then escalate it to a shift captain or the

15 facility's major or chief of security.

16 Q. Did you ever talk to warden Williams

17 himself about it?

18 A. You mean about the timeliness of

19 patients?

20 Q. Yeah, about the timeliness of getting

21 patients over for medical treatment.

22 A. Yes, sir.

23 Q. You did?

24 A. Yes, sir.

25 Q. What was his reaction when you talked

1 in dealing with the warden at his meetings. Am

2 I correct?

3 A. Correct.

4 Q. Let's leave aside for a minute any

5 statements that Dr. Woods might have had about

6 not timely getting prisoners over. Did you have

7 any problems with Dr. Woods other than that?

8 Did you and she have any disagreements or

9 problems whereby you didn't like her for any

10 reason?

11 A. No, sir.

12 MR. LONG-DANIELS: Objection to form,

13 and specifically to the preamble.

14 BY MR. WAIDE:

15 Q. Let me rephrase the question.

16 How did you feel about the statements

17 Dr. Woods was making about failing to timely

18 bring prisoners over? How did you feel about

19 that?

20 A. I really didn't feel any type of way.

21 That's -- you know, that's what she thought. My

22 job is to take her concerns and address them

23 with custody, so it's not -- I didn't have a

24 personal feeling towards it.

25 Q. I'm sorry. Address them with whom?

1 to him about it?

2 A. I don't recall. It's been over a year.

3 I don't recall his exact reaction.

4 Q. All right. Had he ever expressed or

5 made any statements to you about the need to

6 make sure that things going on at the prison

7 stayed within the prison, did not go to

8 outsiders? Had he ever made any statements like

9 that to you?

10 MR. LONG-DANIELS: Objection to form.

11 THE WITNESS: I'm sorry. Was

12 somebody saying something?

13 MR. LONG-DANIELS: That was my

14 objection. You can answer, please.

15 THE WITNESS: I'm sorry, Mr. Waide.

16 Can you repeat the question?

17 BY MR. WAIDE:

18 Q. My question was: Did warden Williams

19 ever make any statements to you about what

20 Dr. Woods was doing concerning her complaints or

21 whether she was taking matters to outsiders, was

22 taking prison matters to outsiders? Did warden

23 Williams ever say anything to you about that?

24 A. No, sir.

25 Q. All right. I don't think we sent you

1 do your job. Correct?

2 A. Yes, sir.

3 Q. And if your security clearance was

4 revoked, that employment agreement required

5 that you no longer enter that facility. Right?

6 A. Correct.

7 Q. And that was the sum total of your

8 agreement, wasn't it?

9 A. Yes, sir.

10 Q. You were hired to do that facility and

11 that facility alone. Right?

12 A. Correct.

13 Q. All right.

14 MR. LONG-DANIELS: That's all I have.

15 EXAMINATION

16 BY MR. PEEPLES:

17 Q. Mr. Day, I'm Tim Peeples. I represent

18 MTC. Just a few follow-up questions.

19 You had mentioned statements that

20 Dr. Woods had made to you from time to time

21 about the MTC staff not getting patients back to

22 medical in what she thought was a timely

23 fashion. Right?

24 A. Correct.

25

1 Ms. Meggs. Correct? Do you remember that?

2 A. Yes, sir.

3 Q. And then subsequently you forwarded

4 that same e-mail to the warden. Do you remember

5 that?

6 A. Yes.

7 Q. Okay. Had you had a conversation with

8 the warden that led up to you sending that

9 e-mail to Ms. Meggs?

10 A. No.

11 Q. Okay. What was it that led you to send

12 the e-mail to Ms. Meggs? What brought that

13 about?

14 A. Well, like I said, it's part of my duty

15 as the administrator there to send it up my

16 chain of command; and they can do with it, you

17 know, whatever they do with it.

18 Q. Okay. And I guess that was maybe a bad

19 question, but just as sort of a

20 foundational-type question: Did you hear

21 Dr. Woods state that she had spoken to the state

22 representative?

23 A. Yes, sir.

24 Q. Okay. And other than just -- you

25 remember that. Do you remember any details

1 Q. Did she have any complaints about you,

2 about your role as HSA?

3 A. Not to my knowledge.

4 Q. She never expressed to you that she

5 didn't like what you were doing.

6 A. No, sir.

7 Q. Did she ever express to you that she

8 thought you were too friendly with the MTC staff

9 or the warden?

10 MR. LONG-DANIELS: Objection to form.

11 A. No, sir.

12 BY MR. PEEPLES:

13 Q. Okay. Did she have any complaints

14 about Centurion in general, or was it just --

15 well, let me rephrase that.

16 Did she have any complaints that you

17 were aware of regarding Centurion?

18 A. Not that I'm aware.

19 Q. Okay. Now, the e-mail that Mr. Waide

20 read to you, you have a general memory of

21 sending that e-mail. Correct?

22 A. Yes, sir.

23 Q. And you had actually originally sent

24 the e-mail up the chain at Centurion to

25 Ms. Meggs and -- that may have been -- yeah, to

1 about what she said?

2 A. Something along the lines of them being

3 friends. I don't remember the exact words, but

4 I know she made reference to knowing him, them

5 being friends and, you know, something about

6 that's what happens when you know people. That

7 was the general sense of, you know, what I

8 remember her saying.

9 Q. Well, they're friends, and you can

10 speak about a number of things, but was the

11 substance of what you heard that she was

12 discussing with the state representative what

13 was going on in the jail?

14 A. I know -- like I said, I remember the

15 parking lot; the cars, you know, in the parking

16 lot.

17 Q. But you don't remember any other

18 details beyond that?

19 A. No, no.

20 Q. Did anyone from Centurion -- well, was

21 the e-mail that you sent to Ms. Meggs, was that

22 the first report that you had made up the chain

23 about what you had heard Dr. Woods say?

24 A. Yes.

25 Q. You didn't call or send another e-mail?

1 There's nothing else out there that you
 2 communicated to Ms. Meggs before this e-mail?
 3 A. Not to my knowledge. Like I said,
 4 Ms. Meggs and I, we communicated often. We
 5 communicated about a number of things, so . . .
 6 Like I said, to my knowledge, this is the only
 7 e-mail concerning that.
 8 Q. Okay. Did Ms. Meggs contact you by
 9 phone or e-mail after she received your e-mail?
 10 A. I don't recall.
 11 Q. Do you remember anyone from Centurion
 12 asking you about what was in your e-mail?
 13 A. No, I don't.
 14 Q. Okay. And you told me that the only --
 15 well, you didn't have a discussion with the
 16 warden that you remember before you forwarded
 17 this e-mail to him. Is that fair?
 18 A. Correct.
 19 Q. Okay. But you were involved in the
 20 meeting where the warden met with Dr. Woods.
 21 Correct?
 22 A. Correct.
 23 Q. Okay. And you explained at the meeting
 24 he advised her that her clearance was being
 25 pulled. Right?

1 true"? Did you ever say that "what I told you
 2 about Dr. Woods' statements is not true"?
 3 A. No, sir.
 4 Q. Did you ever tell him, like, "well,
 5 maybe I'm wrong about this. Maybe she didn't
 6 really say that"? Did you ever say anything
 7 like that to the warden?
 8 A. No, sir.
 9 Q. Okay. And do you stand by what you
 10 reported to the warden as being truthful today?
 11 A. Yes, sir.
 12 MR. LONG-DANIELS: Objection to form.
 13 BY MR. PEEPLES:
 14 Q. You've described your relationship with
 15 Dr. Woods as a working relationship. Is that a
 16 fair way to describe it?
 17 A. Yes, sir.
 18 Q. Are you aware of any animosity that she
 19 had towards you?
 20 A. No, sir.
 21 Q. Did you have any animosity at all
 22 towards her?
 23 A. No, sir.
 24 Q. You guys didn't work very long
 25 together. Right?

1 A. Correct.
 2 Q. And your response, as you testified,
 3 was that you sort of anticipated that there
 4 would be, I guess, an additional conversation,
 5 further conversation, something along those
 6 lines?
 7 A. Yes.
 8 Q. Did you express to the warden, you
 9 know, "Look, I thought -- I didn't really think
 10 that you were going to pull her clearance. I
 11 thought maybe we would have a discussion"? Did
 12 you express that to him?
 13 A. No.
 14 Q. Did you ever express to him -- I think
 15 the term you used was "knee-jerk reaction." Did
 16 you ever express to him, "This is sort of a
 17 knee-jerk reaction. I think this is an
 18 overreaction"? Did you ever express that to
 19 him?
 20 A. No.
 21 Q. Did you ever express that to anyone at
 22 Centurion?
 23 A. No.
 24 Q. Did you ever tell him, "Look, what I've
 25 actually told you about what I heard is not

1 A. Correct.
 2 Q. She's not -- you're not aware of her
 3 ever criticizing you. There's no confrontations
 4 you guys had, nothing like that. Correct?
 5 A. No, sir.
 6 Q. Did you have any reason to make up some
 7 statement by Dr. Woods?
 8 A. No, sir.
 9 Q. Did you ever talk to the state rep?
 10 A. No, sir.
 11 Q. Did you know the identity of the state
 12 rep that was referenced in your e-mail?
 13 A. No.
 14 Q. Did you ever talk with anyone at --
 15 Jerry Williams or anyone else with MDOC about
 16 Dr. Woods' statements or her clearance being
 17 pulled?
 18 A. No, sir.
 19 Wait. I'm sorry. There was an
 20 investigator who did call me. I don't recall
 21 his name. But there was an -- and I don't know
 22 if he was with MDOC. I do know he was
 23 investigating with the state, so . . .
 24 Q. And that obviously occurred after
 25 Dr. Woods' clearance was pulled?

1 A. Correct.

2 Q. And do you remember -- what were you

3 asked?

4 A. I don't recall exactly what he asked

5 me. I don't recall.

6 Q. Were you asked if you overheard

7 statements by Dr. Woods about speaking to the

8 state representative?

9 A. I don't recall what he asked me.

10 Q. It was just a -- was it a phone call

11 with this individual?

12 A. Yes, sir.

13 Q. No e-mail communications that you're

14 aware of?

15 A. I don't remember us e-mailing. If

16 there were, it was very minimal.

17 Q. That's the only -- I would say -- state

18 official that you remember speaking to about

19 this whole situation?

20 A. Correct.

21 Q. How was Dr. Woods to work with?

22 A. For the short time that I worked with

23 her, I mean, I had no issues with her.

24 Q. Do you have medical training in your

25 background?

1 was, you know, quote, out to get her or anything

2 like that?

3 A. No, sir.

4 Q. Did you have any further discussions

5 with the warden after Dr. Woods' clearance was

6 revoked about the clearance being revoked?

7 A. No, sir.

8 MR. PEEPLES: That's all I have.

9 Thank you, Mr. Day.

10 MR. WAIDE: I have just a little

11 follow-up.

12 David, did you have something?

13 MR. LONG-DANIELS: No. Go ahead,

14 please.

15 FURTHER EXAMINATION

16 BY MR. WAIDE:

17 Q. Counsel just asked you about the warden

18 being "out to get her." To your knowledge, do

19 you know of anything that the warden would have

20 had against her other than the fact that she

21 talked to a state legislator -- or his belief

22 that she talked to a state legislator concerning

23 staff shortages which, in her opinion, were

24 jeopardizing medical care? Do you know of

25 anything else that the warden could have had

1 A. I do.

2 Q. What particular training do you have?

3 A. I was an Army medic, and I was a

4 paramedic -- EMT rather -- and I had about a

5 year and a half's worth of nursing school.

6 Q. But you described your role was more of

7 a liaison-type role where you're trying to work

8 out whatever issues there may be between medical

9 and correctional staff. Is that a good way to

10 put it?

11 A. Yes, sir.

12 Q. Whether it's getting patients back for

13 treatment or whatever it may be. Right?

14 A. Yes, sir.

15 Q. Okay. Did you feel like the warden was

16 responsive when you would address issues with

17 him?

18 A. Yes, sir.

19 Q. Did he ever have any complaints about

20 Dr. Woods?

21 A. Not to me, no, sir.

22 Q. Any criticisms of Dr. Woods by the

23 warden?

24 A. No, sir.

25 Q. Did you have any impression that he

1 against her?

2 A. I don't know necessarily against her.

3 I do remember talking to the warden concerning

4 some items that were purchased and given to

5 inmates. I actually talked with April Meggs

6 about it as well. But, again, I don't know

7 that, you know, it was necessarily against her.

8 Q. All right. Are you saying -- are you

9 talking about some items that were found in your

10 office after she had left? Is that what you're

11 talking about?

12 A. Correct.

13 Q. All right. Well, those occurrences

14 wouldn't have had anything -- well, strike that.

15 To your knowledge, did the warden know

16 anything about the allegation that she was

17 giving items to inmates before she was fired?

18 A. It's my recollection that, when I asked

19 Dr. Woods about them, she said that the warden

20 knew. When I asked the warden, the warden said

21 he had no idea.

22 Q. Warden Williams had only been there a

23 short time. Correct?

24 MR. LONG-DANIELS: Objection to form.

25 A. Correct.